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LEGS./REGS. DIV.

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ADMINISTRATION

FHWA Docket No. MC-96-28
Federal Highway Administration
Office of Chief Counsel, HCC-10-Rm 4232
400 Seventh St., S.W.
Washington, DC 20590

In response to the item in the United Motorcoach Associations November 15, 1996 issue of the "Docket", soliciting responses to the current hours of service regulations, FHWA Docket No. MC-96-28, I wish to offer the following suggestion for consideration. It is my opinion that the 10 hour per day driving, and 15 hours per day total on duty time is reasonable, as long as the provisions for off duty time during meals and other routine stops doesn't change.

However, if a driver has 24 consecutive hours off during any 8 day period then his eligible hours should be restored to 70 hours.

I am sure you are aware, to support this proposal with scientific data would be a violation of the current hours of service regulations.

My personal experience as a driver and a manager suggests that one tends to rest and relax more during a 24 hour period of off duty time as opposed to an 8 hour period. With 24 hours off there is less stress, anxiety, and apprehension associated with your next trip or assignment. There is leisure time to accomplish domestic issues. There is appropriate time for planning, recreation, and most importantly rest and sleep.

I feel this would be an effective management tool for planning and compliance. There would be more incentive to leave a driver off for a 24 hour period, knowing that action would restore the drivers 70 hours, as opposed to pushing the limit on a daily and weekly basis, gambling that all trips can be completed within the legal limits as now defined.

Respectfully submitted,

Joseph A. Aliberti, Jr.
Safety Coordinator

JAA/aa

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